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*Attorneys for Defendants and
Counterclaimants Oracle America, Inc. and
Oracle International Corp.*

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 RIMINI STREET, INC., a Nevada
4 corporation,

5 Plaintiff,

6 v.

7 ORACLE INTERNATIONAL
8 CORPORATION, a California corporation,
and ORACLE AMERICA, INC., a Delaware
corporation,

9 Defendants.

CASE NO. 2:14-CV-01699-LRH-CWH

**JOINT STIPULATION TO EXTEND
EXPERT DISCOVERY, SUMMARY
JUDGMENT, AND RELATED
DEADLINES**

10 AND RELATED COUNTERCLAIMS.
11

12 Plaintiff and Counterdefendant Rimini Street, Inc. and Counterdefendant Seth Ravin
13 and Defendants and Counterclaimants Oracle America, Inc. and Oracle International Corp.
14 (collectively, the “Parties”) jointly submit this Stipulation and [Proposed] Order.

15 WHEREAS, on May 4, 2018, the parties exchanged opening expert reports, consisting
16 of reports by 13 different experts;

17 WHEREAS, the current deadline for rebuttal expert reports is June 22, 2018, and the
18 close of expert discovery is August 3, 2018 (ECF No. 805);

19 WHEREAS, the current deadline to file summary judgment motions is August 31, 2018
20 (*id.*);

21 WHEREAS, given the number of experts who will be deposed, the Parties agree that
22 additional time will be necessary to schedule and adequately prepare for such depositions and
23 thus that the close of expert discovery should be extended by four weeks, and that the briefing
24 schedule for summary judgment motions and the date to file a joint pretrial order should be
25 continued accordingly;

26 WHEREAS, the Parties agree to move the close of expert discovery from August 3,
27 2018, to August 31, 2018, pending approval by the Court;

1 WHEREAS, the Parties agree to move the deadline to file summary judgment motions
2 from August 31, 2018, to September 28, 2018, pending approval by the Court;

3 WHEREAS, the Parties agree to move the deadline to file oppositions to summary
4 judgment motions from October 5, 2018, to November 2, 2018, pending approval by the Court;

5 WHEREAS, the Parties agree to move the deadline to file replies in support of summary
6 judgment motions from October 26, 2018, to November 30, 2018, pending approval by the
7 Court;

8 WHEREAS, the Parties agree, pending approval by the Court, to move the deadline to
9 file a joint pretrial order from September 19, 2018, to January 7, 2019, but that if summary
10 judgment motions are filed, the date for filing the joint pretrial order shall be suspended until
11 90 days after a decision on all summary judgment motions.

12 THEREFORE, the Parties stipulate, and request that the Court order, that (i) the close
13 of expert discovery be moved from August 3, 2018, to August 31, 2018; (ii) the deadline to file
14 summary judgment motions be moved from August 31, 2018, to September 28, 2018; (iii) the
15 deadline to file oppositions to summary judgment motions be moved from October 5, 2018, to
16 November 2, 2018; (iv) the deadline to file replies in support of summary judgment motions be
17 moved from October 26, 2018, to November 30, 2018; and (v) the deadline to file a joint pretrial
18 order be moved from September 19, 2018, to January 7, 2019, but if summary judgment
19 motions are filed, the date for filing the joint pretrial order shall be suspended until 90 days
20 after a decision on all summary judgment motions.

21
22 Dated: June 7, 2018

Dated: June 7, 2018

23 GIBSON, DUNN & CRUTCHER LLP

MORGAN, LEWIS & BOCKIUS LLP

24
25 By: Eric D. Vandeveld
Eric D. Vandeveld

By: Thomas S. Hixson
Thomas S. Hixson

26 *Attorneys for Plaintiff and*
27 *Counterdefendant Rimini Street, Inc., and*
Counterdefendant Seth Ravin

Attorney for Defendants and
Counterclaimants Oracle America, Inc. and
Oracle International Corporation

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Dated: June 7, 2018

By: Eric D. Vandeveld
Eric D. Vandeveld

*Attorneys for Plaintiff and Counterdefendant
Rimini Street, Inc., and Counterdefendant Seth
Ravin*

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 RIMINI STREET, INC., a Nevada corporation;
4 Plaintiff,

5 v.

6 ORACLE INTERNATIONAL CORPORATION,
7 a California corporation, and ORACLE
8 AMERICA, INC., a Delaware
9 corporation

10 Defendants.

11 ORACLE AMERICA, INC., a Delaware
12 corporation; and ORACLE
13 INTERNATIONAL CORPORATION, a
14 California corporation,

15 Counterclaimants,

16 v.

17 RIMINI STREET, INC., a Nevada corporation, *et*
18 *al.*,

19 Counterdefendants.

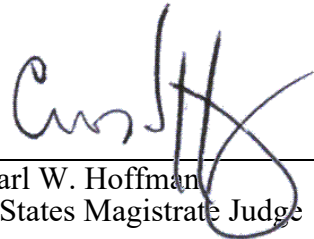
Case No 2:14-cv-01699 LRH CWH

**ORDER RE: JOINT
STIPULATION TO EXTEND
EXPERT DISCOVERY AND
SUMMARY JUDGMENT
MOTION DEADLINES**

20 **ORDER**

21 **IT IS ORDERED** that the close of expert discovery is extended to August 31, 2018;
22 the deadline to file summary judgment motions is extended to September 28, 2018; the
23 deadline for oppositions to summary judgment motions is set for November 2, 2018; the
24 deadline for replies in support of summary judgment motions is set for November 30, 2018;
25 and the deadline to file a joint pretrial order is set for January 7, 2019, but if summary
26 judgment motions are filed, the date for filing the joint pretrial order shall be suspended until
27 90 days after a decision on all summary judgment motions.
28

IT IS SO ORDERED:


Hon. Carl W. Hoffman
United States Magistrate Judge

Dated: June 11, 2018

I hereby certify that on this date, I caused to be electronically uploaded a true and correct copy in Adobe “pdf” format of the above document to the United States District Court’s Case Management and Electronic Case Filing (CM/ECF) system. After the electronic filing of a document, service is deemed complete upon transmission of the Notice of Electronic Filing (“NEF”) to the registered CM/ECF users. All counsel of record are registered users.

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